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 10 Service Employees International Union, Local 715

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

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 15 **STANFORD HOSPITAL & CLINICS and**
LUCILE PACKARD CHILDREN'S
HOSPITAL

Case No: C-07-CV-05158-JF

16
 17 **Petitioners,**
 v.
 18
 19 **SERVICE EMPLOYEES**
INTERNATIONAL UNION, LOCAL 715

JOINT PROPOSED DISCOVERY
PLAN

20 **Respondent.**

Judge: Hon. Jeremy Fogel

22 Pursuant to Federal Rule of Civil Procedure 26(f), a meeting was held in December 2007,
 23 via telephone and was attended by Laurence R. Arnold for Petitioners Stanford Hospital &
 24 Clinics and Lucile Packard Children's Hospital (the "Hospitals") and by Vincent A. Harrington,
 25 Jr. for Respondent Service Employees International Union, Local 715 (the "Union"). The Parties
 26 hereby respectfully submit their Joint Proposed Discovery Plan.

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1 **I. PRE-DISCOVERY DISCLOSURES**

2 Under Federal Rule of Procedure 26(a)(1)(E), this action is exempt from the requirement
 3 of Rule 26(a) pre-discovery disclosures.

4 **II. DISCOVERY PLAN**

5 The Parties anticipate that this case will be resolved by means of a dispositive motion.
 6 The Parties further believe that all evidence that will be relied upon in the resolution of that
 7 motion is already in the possession of both of the Parties. To the extent that either party requires
 8 additional evidence from the other for the resolution of the motion, the Parties will make
 9 arrangements for an informal exchange of such evidence, and believe that this will eliminate the
 10 need for formal discovery in this case.

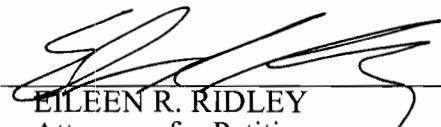
11 In the absence of stipulations, or in the event that the Parties cannot reach informal
 12 agreement concerning the exchange of evidence, the Parties intend to utilize formal discovery
 13 procedures, including interrogatories, requests for admissions, requests for production of
 14 documents, and depositions. Additionally, in the absence of a stipulation, the Union intends to
 15 utilize Requests for Admissions to establish the dates of the filing and service of the Petition, and
 16 the arguments presented by the parties to the Arbitrator.

17 The Parties propose that, in the event that the case has not been resolved by dispositive
 18 motion by June, 15, 2008, that the Parties submit a revised discovery plan at that time.

19 Dated: March 14, 2008

FOLEY & LARDNER LLP
 LAURENCE R. ARNOLD
 EILEEN R. RIDLEY
 SCOTT P. INCIARDI

23 By:

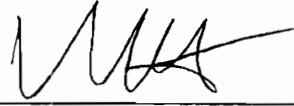


EILEEN R. RIDLEY
 Attorneys for Petitioners
 Stanford Hospital & Clinics and Lucile
 Packard Children's Hospital

1 Dated: March 14, 2008

WEINBERG, ROGER & ROSENFELD
VINCENT A. HARRINGTON, JR.

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3 By:
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VINCENT A. HARRINGTON, JR.
Attorneys for Respondent
Service Employees International Union,
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